



Metlen

Energy & Metals

Green Finance Framework

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1. Introduction

1.1 Background

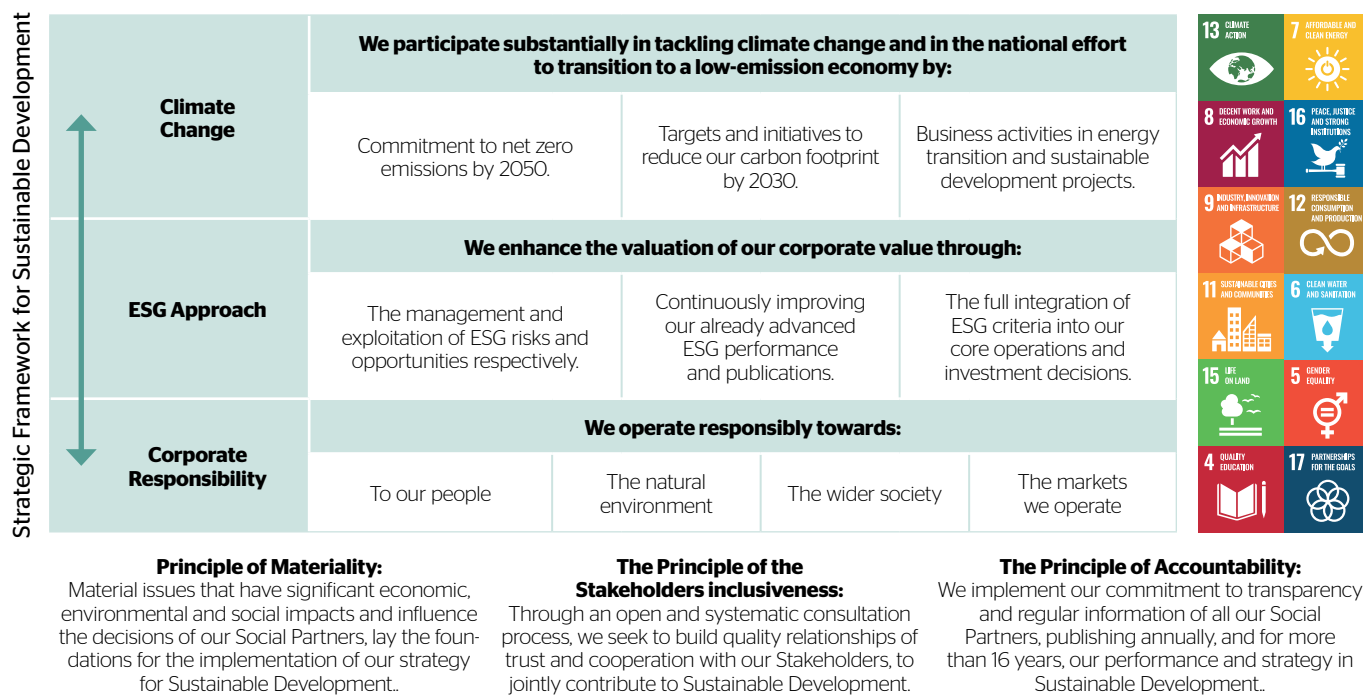
Metlen Energy & Metals (the "Company" or "Metlen") previously known as MYTILINEOS Energy & Metals is an international industrial and energy company operating through two main Business Sectors: Energy and Metals. It is strategically placed at the forefront of the energy transition as an integrated energy provider, while establishing itself as a benchmark for competitive «green» metallurgy at the European and global level. It has a dynamic presence in all 5 continents, is listed on the Athens Stock Exchange and has direct and indirect employees in Greece and abroad.

Sustainable development is part of Metlen's long-term business strategy, but also the driving force through which it aspires to remain competitive over time, address modern challenges such as climate change and exploit opportunities arising from the energy transition. This approach will contribute to a new efficient and socially inclusive growth model for Metlen, which will in turn contribute to the United Nations Sustainable Development Goals (SDGs). Our continued focus on sustainable development has helped us reduce our CO₂ emissions (scope 1 and 2) per m€ of net profits by -80% over the last four years (2020 vs. 2023).

1.2 Metlen's Sustainability Strategy

Metlen's Sustainable Development Strategy¹ aims to create long-term and sustainable value for its shareholders and other groups of its Social Partners, through a holistic approach that combines financial stability with social and environmental responsibility. It is implemented through three basic levels (described below), which are inextricably linked to each other, while it is governed by specific Principles that ensure completeness (Materiality Principle), quality (Stakeholder Inclusiveness Principle) and transparency (Accountability Principle) throughout its activity.

“We create and distribute sustainable value to all our stakeholders, pursuing our business and economic growth alongside our commitment to the Global Sustainable Development Goals”



The 1st level of the Company's Strategic Framework for Sustainable Development expresses the Company's commitment to tackling climate change and contributing to a low-carbon economy. Metlen is fully aware that climate change is one of the most urgent issues facing the planet. The Company, considering the high CO₂ intensity of its production processes, has highlighted the adaptation of its activities to the consequences of climate change and the implementation of initiatives to address it, as a key element for its sustainable and responsible development. To this end, it has a timely strategy to tackle climate change that directs its initiatives to reduce CO₂ emissions as defined by the Kyoto Protocol, the Paris Agreement on climate change and the corresponding National Plan of Greece², which determines its contribution to the EU Green Deal³.

1. <https://www.metlengroup.com/sustainability/our-approach/our-strategy/>

The 2nd level focuses on Metlen's systematic approach to recording, optimally managing and disclosing ESG risks and opportunities that may affect its performance as well as its effort to implement its strategy. Through the ESG approach, Metlen enhances its ability to create long-term value and manage significant changes in the environment in which it operates. In this way it meets both the modern sustainability requirements of the investment community, capital markets and financial institutions, as well as society's expectations for commitment and transparency on these issues.

The 3rd level focuses on the responsible operation of Metlen, which has been systematically cultivated since 2008, through the implementation of responsible entrepreneurship and the Company's commitment to the 10 Principles of the UN Global Compact. Responsible entrepreneurship for Metlen is a continuous process of self-improvement and continuous learning, while it also acts as a key mechanism for renewing its «social» license to operate and for contributing to the improvement of its competitiveness at the national and international level.

1.3 Tackling climate change & Energy transition

Tackling climate change is a key pillar of Metlen's broader Sustainable Development Strategy and is directly linked to the UN SDGs (7: Clean and Affordable Energy & 13: Climate Action).

In this context, the Company's approach is characterized by:

- The implementation of its central Environmental Policy⁴ with special reference to tackling climate change and the responsible use of energy and other natural resources, to promote its commitments and strengthen the effort to understand and manage its risks and opportunities as well as its climate-related impacts in the context of its activities.
- The climate commitments and targets as well as the initiatives it has taken to reduce its carbon footprint which are directly linked to its business strategy.
- The adoption of the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), as well as the measures to strengthen the resilience of its production units, in the context of its adaptation to climate change, considering the relevant risks and opportunities.
- Aligning its key administrative functions with climate change issues.
- The exploitation of business opportunities in the context of the energy transition.
- Its voluntary participation in the global Sustainable Development initiative CDP - Climate Change, certifying, based on the results of the annual assessments by the Organization, that it undertakes coordinated actions to manage climate issues and in particular the potential risks and opportunities related to climate change in its activity.

Metlen has set as an overall target to reduce its **total direct and indirect CO₂-eq emissions (Scope 1 & 2) by 30% by 2030** (versus 2019 baseline), from all its relevant activities in Greece and abroad as a first milestone to achieve its **commitment to net zero emissions by 2050**. The Company, in its 2020 climate targeting exercise, chose 2019 as its base year, as this year was representative of its historical emissions compared to their average since 2012. This option was based on a solid analysis of Scope 1 and 2 emissions, ensuring that its climate objectives are aligned with the well-below 2°C scenario. Also, the Company's climate goals are inextricably linked to the Company's central Environmental Policy since they are a key part of it, expressing its corporate commitment to reduce greenhouse gas (GHG) emissions and tackling climate change.

To achieve the aforementioned overall target and commitments, the Company developed corresponding individual sub-targets per Business Sector. These are as follows:

- Metlen's Metals Business Sector **commits to reduce its total CO₂-eq emissions (scope 1 & 2) emissions by 65% and its specific emissions (CO₂-eq/t Al produced) by 75% by 2030**
- Metlen's Energy Business Sector **commits to reducing its specific emissions (scope 1 & 2) (CO₂-eq/MWh produced) by approximately 50% by 2030**

It is worth noting that the above targets are subject to review: over the past three years, Metlen has been in a phase of dynamic growth, executing a major transformation alongside a significant acquisition strategy. As a result, Metlen, while maintaining its commitment to achieving net-zero emissions by 2050, is currently reviewing its interim climate targets (for the year 2030) and its initiatives to reduce carbon emissions from its operations. This review will take into account the new circumstances arising from the recent acquisitions and the Company's strategic business decisions.

2. https://commission.europa.eu/publications/greece-draft-updated-necp-2021-2030_en

3. https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal_en

4. <https://www.metlengroup.com/media/gfrhiqos/environmental-policy.pdf>

Metlen, in the coming years, will continue to deploy its business model, with more investments to strengthen its presence in renewable energy and further implementation of a significant portfolio of over 3.5GW of Renewable Energy Systems (RES) projects, in Greece and abroad. Also, the Company will invest in the electrification of its metallurgical activities exclusively from renewable energy sources, in the significant increase in the amount of secondary aluminium produced, and in the application of state-of-the-art technologies and the exploitation of digital industrial processes in production stages, to improve energy efficiency.

In this context, the Company, in order to meet the ambitious commitments described above and finance projects that will deliver benefits to support its business strategy and vision, created and has now updated its green finance framework, which is defined further in the next section.

2. Green Finance Framework

At Metlen Energy & Metals we are strongly committed to enhancing sustainability in our entire operations and value chain and aligning this commitment to our funding strategy. We first demonstrated this with the publication of our inaugural Green Bond Framework in 2021 ("Inaugural Framework"), and the issuance of a €500 million 5.5-year green bond in April 2021.

This updated Green Finance Framework (the "Framework") aims to expand the scope of the Inaugural Framework to cover green bonds and loans, align the Framework with the latest market principles, update the eligibility criteria of the Use of Proceeds to align with the relevant EU Taxonomy Regulation SCC and expand the Use of Proceeds categories to also include eligible green Energy Storage projects, amongst other changes.

2.1 Alignment with Market Principles

The Framework is aligned with the Green Bond Principles⁵ ("GBP") published in June 2021 (with June 2022 Appendix 1), administered by the International Capital Market Association ("ICMA") as well as the Green Loan Principles⁶ ("GLP") published in February 2023, administered by the Loan Market Association ("LMA"), the Asia Pacific LMA ("APLMA") and the Loan Syndications and Trading Association ("LSTA").

The Framework therefore adopts the four core components of the GBP and GLP, which include:

1. Use of Proceeds
2. Process for Project Evaluation and Selection
3. Management of Proceeds
4. Reporting

The Framework also follows the key recommendation of the ICMA and LMA/APLMA/LSTA principles with regards to External Reviews.

2.2 Alignment with the EU Taxonomy Regulation

Metlen recognizes the importance of the EU Taxonomy Delegated Acts on Climate Change Mitigation and Adaptation⁷ (the "EU Taxonomy Regulation"). The Framework Use of Proceeds eligibility criteria are aligned with the relevant Substantial Contribution Criteria (SCC) of the EU Taxonomy Regulation. For Metlen's eligible activities within the European Union (EU), Metlen will aim to align the eligibility criteria fully with the EU Taxonomy Regulation including the SCC, Do No Significant Harm (DNSH) and Minimum Safeguards provisions. While Metlen strives to assess and implement DNSH and MS provisions in its global operations outside the EU, the feasibility of this can vary depending on the local context of the country in question. Where feasible, the Framework also takes into consideration components of the European Green Bond Standard⁸.

This Framework may be updated from time to time to ensure continued alignment with voluntary market practices, emerging standards and classification systems. Any updated version of this Framework will either maintain or improve the current levels of transparency and reporting disclosures, including the corresponding External Review.

5. **ICMA Green Bond Principles (GBP) 2021** (with June 2022 Appendix 1). The possible types of Green Bonds to be issued against the framework are as defined in Appendix 1, with the associated disclosure requirements for covered bonds to be followed if relevant.

6. **LMA Green Loan Principles (GLP) 2023**

7. **EU Taxonomy Delegated Act on Climate Change Mitigation and Adaptation published in April 2021 and adopted in June 2021**




8. **European Green Bond Standard**

2.3 Use of Proceeds

Under this Framework, Metlen can issue green bonds and loans (together, "Green Financing Instruments"). An amount equivalent to the net proceeds of any Metlen Green Financing Instrument will be used to finance, or refinance, in whole or in part, Eligible Green Projects (including other related and supporting expenditures) that meet the Eligibility Criteria set out below. Eligible Green Projects may include assets, capital expenditures, operational expenditures including research & development expenses, and/or equity investments⁹.

Eligible Green Projects are limited to those that occurred / will occur in the 3 calendar years prior to issuance (look-back period), the year of issuance, and the 3 calendar years following issuance (look-forward period) of each Green Financing Instrument.

2.3.1 Eligible Green Projects

Eligible Green Category	EU Taxonomy Regulation Mapping	Eligibility Criteria	UN SDGs
Renewable Energy Production	Climate change mitigation <ul style="list-style-type: none"> 4.1: Electricity generation using solar photovoltaic technology 4.3 Electricity generation from wind power 4.5 Electricity generation from hydropower 	<ul style="list-style-type: none"> Investments in / expenditures for the acquisition, conception, construction, development, and installation of renewable energy production units from the following renewable energy sources: <ul style="list-style-type: none"> ~ Solar: Photovoltaics (PV) ~ Wind: onshore and offshore ~ Hydropower which meets at least one of the following criteria: run-of-the-river plant that does not have an artificial reservoir, has a power density above 5W/m² and/or has life-cycle GHG emissions lower than 100g CO₂e/kWh 	
Renewable Energy Storage	Climate change mitigation <ul style="list-style-type: none"> 4.10: Storage of electricity 	<ul style="list-style-type: none"> Financing related to the construction, development, acquisition, maintenance, and operation of electricity storage including Battery Energy Storage Systems (BESS) 	
Eco-efficient and/or circular economy adapted products, production technologies and processes	Climate change mitigation <ul style="list-style-type: none"> 3.8: Manufacture of Aluminium 	<ul style="list-style-type: none"> Investment in / expenditures in the manufacturing of recycled/secondary aluminium¹⁰ Investment in primary aluminium production which complies with two of the following criteria until 2025 and all of the following criteria after 2025: <ul style="list-style-type: none"> ~ GHG emissions do not exceed 1,484 tCO₂e per ton of aluminium manufactured ~ Average carbon intensity for the indirect GHG emissions does not exceed 100g CO₂e/kWh ~ Electricity consumption for the manufacturing process does not exceed 15.5 MWh/t Al 	

2.3.2 Exclusions

For the avoidance of doubt, the following activities are excluded from any financing by Metlen's Green Financing Instrument(s): projects related to fossil fuel-related energy generation and large hydro (>10MW).

9. Equity participations in entities where at least 95% of the revenues can be attributed to one or more of the Eligible Green Project Categories described in the Use of Proceeds section of this Framework.

10. Comprised of nearly 99% scrap aluminium. Scrap aluminium also includes primary aluminium that is out of specs, which can be recycled and remelted to produce new aluminium products.

2.4 Process for Project Evaluation and Selection

The Eligible Green Projects will be subject to the following evaluation and selection process, which ensures that they meet the criteria set out in the Use of Proceeds section, including the exclusionary criteria.

Metlen has established a Green Financing Committee (GFC) with responsibility for governing the selection and monitoring of the Eligible Green Projects.

The GFC is composed of the following members and will be chaired by the Treasury Division:

- Sustainable Development Division
- Finance Division
- Relevant Business Sectors

The GFC meets once a year and ad-hoc when potential green projects arise for evaluation.

The process for the evaluation and selection of Eligible Green Projects has the following main steps:

1. A list of potential green projects is prepared, in terms of use in terms of expected alignment with Use of Proceeds criteria and is evaluated by the environmental teams of the Company's Business Sectors and the Treasury/Finance Divisions.
2. The Sustainable Development Division evaluates the projects against the following criteria, based on the inputs from the environmental teams of the Business Sectors and the Finance Division: alignment with the requirements of this Framework (including assessment against the EU Taxonomy SCC as well as the DNSH and MS provisions, where relevant), alignment with Metlen's Sustainable Development strategy, contribution to the relevant emissions reduction targets (where applicable) and absence of any ESG controversies. Once the aforementioned criteria are met the project and its characterization as an Eligible Green Project are approved by the Sustainable Development Division.
3. The environmental teams of the Company's Business Sectors and other relevant departments examine the projects' alignment with the selection criteria (as described in Appendix 1) and identify and manage potential material environmental and social risks associated with each project. In parallel, the expected impacts of the projects are assessed via specific KPIs (as referred to the Reporting section of this Framework).
4. The list of selected Eligible Green Projects is compiled by the relevant Business Sectors and submitted to the Treasury/Finance Divisions for final validation and addition to the allocated equivalent amount of net proceeds balance. The list is finally submitted to the Green Financing Committee for approval and assessment of funding allocation.
5. Allocation and impact reporting is performed by Treasury/Finance and Sustainable Development Divisions on a yearly basis based on the inputs from the relevant Business Sectors. This annual reporting will be validated by the GFC.

The responsibility and coordination of the process described above lies with Metlen's Treasury Division and is graphically described below:

Overview of process for Green Projects selection

	1	2	3	4	5
	Primary selection	Primary assessment	Final Evaluation	Validation & Allocation	Reporting
Tasks	! Prepare list of potential green projects	! Assess alignment of potential green projects with Framework requirements, including EU Taxonomy SCC (+DNSH & MS if applicable). Sustainable Development Strategy and emissions reduction targets (if applicable) ! Eliminate projects with ESG controversies ! Sustainable Development Division approves characterization as Eligible Green Projects	! Assess alignment of Eligible Green Projects with the criteria in Appendix 1 ! Identify and manage potential E&S risks of the Projects ! Assess expected impacts of the Projects	! Submission of list of Eligible Green Projects to Treasury/Finance Divisions ! Final validation of the list and addition to the allocated net proceeds balance ! Approval of list by the Green Financing Committee for funding allocation	! Prepare annual allocation and impact reporting (with inputs from Business Sector teams) ! Validate annual allocation and impact reporting
Deliverable(s)	! List of potential Green Projects	! List of Eligible Green Projects for final evaluation	! List of Eligible Green Projects	! Final list of approved Eligible Green Projects ! Final allocation of net proceeds	! Allocation report ! Impact report (can be combined Allocation & Impact report)
Responsible	! Environmental teams of Business Sectors ! Treasury/Finance Divisions	! Sustainable Development Division ! Environmental teams of Business Sectors ! Finance Division	! Environmental teams of Business Sectors (and other relevant departments)	! Treasury/Finance Divisions ! Business Sectors ! Green Financing Committee	! Treasury/Finance Divisions ! Sustainable Development Division ! Green Financing Committee ! Business Sectors

2.5 Management of Proceeds

To manage the equivalent amount of the net proceeds of each Metlen Green Financing Instrument and avoid any double counting, Metlen will establish a Green Financing Register.

An amount equivalent to the net proceeds of each Metlen Green Financing Instrument will be earmarked towards Eligible Green Projects (financing instrument-by-financing instrument approach) and will be identified in the Green Financing Register by the GFC.

The Green Financing Register will contain the following relevant information:

1. Details of the Green Financing Instruments(s): key information including transaction date, equivalent amount of net proceeds, settlement date, maturity date, and interest margin or coupon, ISIN number (where relevant) etc.
2. Details of Use of Proceeds, including:
 - a. Summary detail of Eligible Green Projects to which the equivalent amount of the net proceeds of the Green Financing Instrument(s) have been earmarked;
 - b. Amount of allocations made;
 - c. Any unallocated amounts;
 - d. Other necessary information

In the event that funds cannot be immediately and fully allocated, an amount equivalent to the net proceeds will be held in line with Metlen's general liquidity guidelines until allocation to Eligible Green Projects.

In the event that an Eligible Green Project to which the amount equivalent to the net proceeds of a Green Financing Instrument is allocated no longer meets the Use of Proceeds criteria of this Framework, Metlen will aim to substitute the Eligible Green Project with replacement Eligible Green Project(s) on a best effort basis, as soon as possible and within 24 months.

2.6 Reporting

Annually, and until the full allocation of the amount equivalent to the net proceeds and as necessary thereafter in the event of material developments, Metlen will provide to investors on its website <https://www.metlengroup.com/> a Green Financing Instrument Report, for all Green Financing Instruments for which such reporting is required as per their final documentation. For some Green Financing Instruments, this annual reporting may be provided bilaterally to the relevant lender(s) and/or investor(s), as per the requirements of the final documentation for the Green Financing Instrument:

2.6.1 Allocation Reporting

Metlen will provide information on the allocation of the equivalent amount of the net proceeds of its Green Financing Instruments. The information will contain at least the following details:

- The total equivalent amount of net proceeds allocated to the Eligible Green Projects
- Breakdown of allocation by Eligible Green Project category
- Breakdown of allocation by project location
- Breakdown of refinancing versus new financing (share of refinancing)
- The outstanding amount equivalent of net proceeds yet to be allocated to projects at the end of the reporting period (The balance of unallocated amount equivalent of net proceeds)

2.6.2 Impact Reporting

Metlen intends to align, on a best effort basis, with the reporting recommendations as outlined in ICMA's "Handbook – Harmonized Framework for Impact Reporting (June 2024)"¹¹.

Metlen will provide impact reporting at the Eligible Green Project Category level, including project level information where possible, which may include the following estimated Impact Reporting Metrics.

Eligible Green Project Category	Potential Impact Indicators
Renewable Energy Production	<ul style="list-style-type: none">Annual renewable energy produced (MWh/year)Annual GHG emissions avoided (tCO₂e/year)Capacity of renewable energy plant(s) constructed (MW)
Renewable Energy Storage	<ul style="list-style-type: none">Additional energy storage capacity installed, acquired and/or maintained (MWh)
Eco-efficient and/or circular economy adapted products, production technologies and processes	<ul style="list-style-type: none">Recycled Aluminum produced (tons)Avoided resource waste (m³ or tonnes)GHG emissions avoided per year (tCO₂e/year)

2.7 External Review

Metlen's Green Finance Framework and post-issuance reporting is and will be supported by the following external reviews:

Second Party Opinion

Metlen has engaged ISS Corporate to provide a Second Party Opinion (SPO) on this Framework, to confirm alignment with the GBP and GLP. The Second Party Opinion is published on Metlen's website.

Post-Issuance External Verification on Reporting

Metlen will request on an annual basis, starting one year after issuance and until full allocation, an assurance report (at least on a limited assurance basis) on allocation reporting, provided by an external review provider, if this is required as per the final documentation of the Green Financing Instrument. The assurance report may be published on Metlen's website or provided bilaterally to lender(s) and/or investor(s) in accordance with the final documentation for the Green Financing Instrument.

3. Amendments to this Framework

The Green Financing Committee or the Treasury will review this Framework on a regular basis, including its alignment to updated versions of the GBP and GLP as and when they are released, with the aim of adhering to best practices in the market. Such review may result in this Framework being updated and amended. The updates, if not minor in nature, will be subject to the prior approval of Metlen and external review by a qualified SPO provider.

Any future updated version of this Framework that may exist will either keep or improve the current levels of transparency and reporting disclosures, including the corresponding review by an external reviewer. The updated Framework, if any, will be published on Metlen's website and will replace this Framework.

11. ICMA, Handbook – Harmonized Framework for Impact Reporting (June 2024)

Appendix 1: Environmental and Social Criteria

The ESG assessment on potentially eligible green projects will consider the following criteria (the criteria may vary per project):

Criteria	Commitment / Supporting documentation
Environmental management at design, construction, and operational phase	<ul style="list-style-type: none"> • Environmental Impact Assessment based on local regulation, and implementation of appropriate measures to limit, mitigate or compensate negative impacts (environmental specifications) • Project operated within an environmental management system implemented, audited, with targets, guidelines and appropriate monitoring to report (i.e. ISO 14001)
Environmental accidents prevention and control	<ul style="list-style-type: none"> • Existence of accidental pollution emergency response plans
Quality of Health & Safety and Employment conditions	<ul style="list-style-type: none"> • Safety risk assessment, implementation of appropriate measures for employees and contractors • Existence of H&S monitoring indicators (i.e. Frequency index, Incidence index) • Training hours in prevention of occupational risk • Project operated within an H&S management system implemented, audited, with targets, guidelines and appropriate monitoring to report (i.e. ISO 45001)
Local stakeholders' engagement	<ul style="list-style-type: none"> • Consultation with local stakeholders (in accordance with the requirements brought forward by the relevant legislation in force).
Fight against climate change by producing clean energy	<ul style="list-style-type: none"> • Contribution of the project to avoid/reduce CO₂ emissions
Human Rights	<ul style="list-style-type: none"> • Assessment based on Metlen Human Rights Policy
Suppliers	<ul style="list-style-type: none"> • Acceptance of Metlen Suppliers & Business Partners Code of Conduct in the contracts with suppliers.
Protection of biodiversity	<ul style="list-style-type: none"> • Mitigation or corrective actions implemented in case of biodiversity incident
Supporting local communities and their economies	<ul style="list-style-type: none"> • Promotion of local purchases and/or local employment (expenditures on local suppliers, where feasible)

Appendix 2: Corporate Social Responsibility (CSR) Policy¹²

Preface

Corporate Social Responsibility (CSR) is a multi-faceted and complex practice for Metlen, mainly characterized by the Company's conscious self-commitment to responsible entrepreneurship and continuous improvement. Moreover, it is directly related to the business operations, as it defines how the Company chooses to make progress, taking solid steps, towards Sustainable Development, based on its vision, mission and values.

The CSR philosophy at Metlen

Through CSR, Metlen expresses its continuous commitment to attaining Sustainable Development. The Company perceives CSR as a fundamental factor that contributes to social and environmental risks prevention, as well as the prevention of risks related to human resources management and the Company's presence in the market, contributing to the development of a climate of trust, in which the Company can carry out business and innovate, creating value for all its Stakeholder groups. CSR at Metlen is a practice with significant human, environmental and social aspects going beyond legislative compliance (Law 4403/2016). It is an ongoing self-improvement and an incessant learning process aimed at increasing the Company's positive impact on the greater society, in combination with the range and nature of its economic activity, while also serving as a key mechanism for renewing its "social" operating permit, also improving its competitiveness at national and international levels.

Sustainable Development Goals (Agenda 2030)

Metlen is a signatory of the United Nations Global Compact (UNGC). In September 2015, the United Nations adopted 17 Sustainable Development Goals that comprise a new, universal set of objectives, goals and indicators that UN Member States are expected to use in formulating their agendas and policies up until 2030. The Company's current CSR policy has been aligned with these Goals, being also used as a common basis for dialogue and cooperation with its Stakeholder groups.

The strategic lines of Metlen CSR policy

The CSR policy of Metlen mainly derives from its business mission and is closely related to the minimization of its environmental impacts, the increase in its social effect and contribution, as well as the enhancement of the prevention/precaution principle within the context of its activities. To achieve its objectives, the Company operates based on specific strategic lines, as presented in the table below:

12. https://www.metlengroup.com/media/wiglbyqn/mytilineos_csr-policy_2024_eng.pdf

Strategic lines of Metlen CSR policy	Sustainable Development Goals
Ensuring a working environment free of accidents or occupational diseases.	 
The continuous mitigation of environmental impacts and the climate change adaptation	     
Maintaining regulatory compliance and constant vigilance for addressing conditions that may facilitate corruption incidents at all Company levels and activities.	
Developing, managing and retaining dedicated human resources with practices that promote equal opportunities and respect for human rights.	    
Systematic and honest dialogue with key Social Partner groups, with a view to preserving mutual trust and understanding more comprehensively the impact of the Company's operation.	
The contribution to the development of the local infrastructure and in general to the prosperity and the respect of the rights of the citizens of the local communities that are adjacent to the Company's industrial plants.	 
Implementing actions of high social value, also through the development of the employees' volunteerism (related to corporate or individual initiatives) addressed to a wide range of social groups, taking into account both the current social and economic conditions, as the case may be, and the cultural priorities and challenges.	    
Emphasis on the quality and safe use specifications of the Company's products, as well as on the continuous support, service and customers' satisfaction.	  
Developing responsible value chain by expanding the commitment of the Company's main suppliers and associates to Sustainable Development.	  
Voluntary participation in domestic business networks and international organizations and sustainable development initiatives promoting Metlen's CSR goals and philosophy.	

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Appendix 3: Environmental strategic Lines

Protecting the environment, supporting the transition to a low-carbon economy, addressing the challenges of Climate Change and contributing to the achievement of the Sustainable Development Goals are fundamental to Metlen's business growth and a key part of its strategy. The Company is committed to the protection of the environment and, more generally, to the sustainable management of the natural capital it utilizes in the context of its business activity. To this end, it incorporates into its business strategy, investments and internal decision-making processes, the following basic principles of responsible environmental behavior:

Metlen Environmental strategic lines¹³

- Compliance with the applicable environmental legislation and standards.
- Adherence to the agreements and commitments undertaken by Metlen beyond its legal obligations.
- Implementation of Environmental Management Systems
- Tackling Climate Change
- Sustainable management of the natural capital
- Promotion of innovation through research and the development of new technologies that are gradually implemented in the Company's production units.
- Provision of information and training to business partners (contractors, suppliers, clients) on the Company's environmental policy and objectives, to enhance their environmental awareness.
- Establishment of a procedure for reporting and investigating environmental incidents and taking preventive and corrective actions.
- Identification of Stakeholders' needs and expectations regarding environmental issues, demonstrating increased awareness of them and promoting a climate of cooperation.
- Application of environmental criteria in key Company processes (such as procurement & purchases, logistics, mergers and acquisitions, approval of large-scale Company projects).

The fulfilment of the above commitments is supported by individual processes, investments in the upgrades of production units, the exploitation of new technological developments, and the adoption of best practices by each Business Sectors. At the same time, in all its Business Sectors, Metlen has established Environmental Management Systems certified according to the International Standard ISO 14001:2015, by an independent certification body.

13. <https://www.metlengroup.com/media/gfrhigos/environmental-policy.pdf>